Notes from 11/22/13 Phone Call

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- Facility is a polystyrene manufacturer of plastic pellets. ~1,000,000 gallons of pellets are created every week
- The manufacturing process relies on raw materials, and there are no PCB products or byproducts, used or created in the manufacturing process.
- The production train 4 was built in 1968. Chromic paint and a PCB-based fire retardant was sprayed around the train.
- In sampling, the highest concentrations of PCBs were found in the deepest layers of paint -> in the Chromic paint.
- Americas Styrenics/ERM are proposing to strip the super structure of all fire retardant/paint, down to the metal surfaces.
- The tar-like substance is the Dow Therm coolant a substance that is used to cool the industrial process and some times leaks onto the concrete pad. The train process runs at hundreds of degrees, and the coolant solidifies around 50 degrees Farenheit
- The hypothesis is that the porous fire retardant ("monokote") surrounding the Chromic paint leached out the PCBs from the paint. With regular washdowns, the water was a path for the PCBs migrate onto the concrete pad. There are no other chemicals in the process that would have mixed with the PCBs.
- There is no record of Galbestos use, nor PCBs in other parts of the property.
- The concrete slab is probably 8"-10". Since the equipment sits on the slab, any remediation has to be done that doesn't significantly damage the pad. One option not mentioned in the Notification would be to do localized removals in hotspots, while also covering the whole slab with an overall management plan.
- When maintenance is done, specific pieces can be taken out of service and done
 at a separate warehouse. Workers use respirators and appropriate chemical
 suits to do enter the area.
- The plant receives raw materials, and shuts down about once per year. It then takes the facility about 10 days to start back up again.